

EXHIBIT C

**UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DONNA M. TRUSKY, AHSA JEFFRIES,
GAYNELL COLE on behalf of themselves
and all others similarly situated,

Plaintiff,

Case No. 2:11-cv-12815-SFC-LJM

Honorable Sean F. Cox

vs.

GENERAL MOTORS COMPANY

Defendant.

David H. Fink (P28235)
Darryl Bressack (P67820)
Fink + Associates Law
100 West Long Lake Rd., Suite 111
Bloomfield Hills, MI 48304
(248) 971-2500
dfink@finkandassociateslaw.com

Marc H. Edelson
Edelson & Associates, LLC
45 West Court Street
Doylestown, PA 18901
(215) 230-8043
medelson@edelson-law.com

Jeffrey L. Kodroff
John A. Macoretta
Spector, Roseman Kodroff & Willis, PC
1818 Market Street
Philadelphia, PA 19103
(215) 496-06611
jkodroff@srkw-law.com
jmacoretta@srkw-law.com

Attorneys for Plaintiffs

Michael P. Cooney (P39405)
Benjamin W. Jeffers (P57161)
Attorneys for Defendant
Dykema Gossett PLLC
400 Renaissance Center
Detroit, MI 48243
(313) 568-5340
bjeffers@dykema.com
mcooney@dykema.com

**DECLARATION OF STEVEN D. OAKLEY
IN SUPPORT OF MOTION TO DISMISS FOR LACK JURISDICTION**

I, Steven D. Oakley, declare and state:

1. I am employed by General Motors LLC ("GM") as Manager, Dealer Service and Warranty Operations. I make this declaration in support of GM's motion to dismiss this matter for lack of subject matter jurisdiction.

2. In connection with my responsibilities in the ordinary course, I have access to GM's systems and records with respect to vehicle warranties and repairs performed pursuant to those warranties ("Warranty Records"). These Warranty Records include data acquired by GM from General Motors Corporation ("Old GM") pursuant to the bankruptcy 363 sale consummated in 2009.

3. GM's Warranty Records are maintained by vehicle identification number. GM records reflect¹ that the claims asserted by individual plaintiffs pertain to the following vehicles:

- a) A Chevrolet Impala LT Sedan, Vehicle Identification Number 2G1WT58N881214824 (the "Trusky Vehicle")
- b) A 2008 Chevrolet Impala, 50th Anniversary Edition, Vehicle Identification Number 2G1WV58KKX81252684 (the "Cole Vehicle")
- c) A 2007 Chevrolet Impala LT Sedan, Vehicle Identification Number 2G1WT58K879258098 (the "Jeffries Vehicle")

4. I have reviewed warranty records related to the Trusky Vehicle, which indicate as follows:

- a) The Trusky Vehicle was initially delivered on February 18, 2008 by Allan A. Hornbeck Chevrolet in Forest City, Pennsylvania. The reported mileage at delivery was 10.
- b) In consequence, the Bumper to Bumper coverage (three years/36,000 miles) on the Trusky Vehicle expired no later than February 18, 2011.

5. I have reviewed warranty records related to the Cole Vehicle, which indicate as follows:

- a) The Cole Vehicle was initially delivered on June 26, 2008. The reported mileage at delivery was 254.

¹ Because Ms. Jeffries purchased her vehicle used, GM was required to inquire with the selling dealer to identify the vehicle identification number of her vehicle.

- b) In consequence, the Bumper to Bumper coverage (three years/36,000 miles) on the Cole Vehicle expired no later than June 26, 2011.
 - c) On July 5, 2011, the vehicle was presented for service at Ramey Motors, Inc. in Princeton, West Virginia. Although the applicable warranty was then expired, the dealer performed a tire replacement on GM's expense as customer goodwill.
6. I have reviewed warranty records related to the Jeffries Vehicle, which indicate as follows:
- a) The Jeffries Vehicle was initially delivered January 2, 2007. The reported mileage at delivery was 10.
 - b) In consequence, the Bumper to Bumper coverage (three years/36,000 miles) on the Jeffries Vehicle expired no later than January 2, 2010. However, on February 12, 2009, the Jeffries Vehicle received warranty service from Gordon Chevrolet, Inc. in Garden City, Michigan. At that time, vehicle mileage was reported as 35,979. Accordingly, unless use of the vehicle ceased immediately, the Bumper to Bumper coverage on the Jeffries expired in February or March of 2009. This is consistent with information received from Merollis Chevrolet, which indicates that the Jeffries vehicle had 39,115 miles when sold to Ms. Jeffries in June of 2009. See Odometer Statement Attached as Exhibit A.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed this 26th day of September, 2011.


Steven D. Oakley

EXHIBIT A

ASHA DUNEENA JEFFRIES		4289
CUSTOMER'S NAME		STOCK NO
ODOMETER DISCLOSURE STATEMENT		
<i>Federal law (and State law if applicable) requires that you state the mileage upon transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.</i>		
1. MEROLLIS CHEVROLET SALES		(Transferor's name, Print)
state that the odometer now reads <u>39115</u> (no tenths) miles and to the best of my knowledge that it reflects the actual mileage of the vehicle described below, unless one of the following statements is checked.		
<input type="checkbox"/> (1) I hereby certify that to the best of my knowledge the odometer reading reflects the amount of mileage in excess of its mechanical limits.		
<input checked="" type="checkbox"/> (2) I hereby certify that the odometer reading is NOT the actual mileage.		
WARNING - ODOMETER DISCREPANCY		
MAKE	MODEL	BODY TYPE
CHEVROLET	IMPALA	4 DOOR
VEHICLE IDENTIFICATION NUMBER		YEAR
2G1WT58K879258098		2007
<input checked="" type="checkbox"/> TRANSFEROR'S SIGNATURE		
MEROLLIS CHEVROLET SALES		
PRINTED NAME		
21800 GRATIOT AVE		
TRANSFEROR'S ADDRESS (STREET)		
EASTPOINTE	MI	48021
CITY	STATE	ZIP CODE
06/04/09		
DATE OF STATEMENT		
<input checked="" type="checkbox"/> TRANSFEREE'S SIGNATURE		
ASHA DUNEENA JEFFRIES		
PRINTED NAME		
ASHA DUNEENA JEFFRIES		
TRANSFEREE'S NAME		
13927 CHANDLER PARK DR		
TRANSFEREE'S ADDRESS (STREET)		
DETROIT	MI	48213-360
CITY	STATE	ZIP CODE

ODOM-103-N (4/89) Reynolds and Reynolds